

FILED
U.S. DISTRICT COURT

My Name	<u>Jesse Majors</u>
Address	6649 South 5500 West
City, State, Zip	West Jordan, Utah 84081
Phone	801-360-6880
E-mail	<u>jessemajors@netscape.com</u>

2011 JUL 19 P 1:17
DISTRICT OF UTAH
BY: DEPUTY CLERK

I am the Plaintiff
 Attorney for the Plaintiff and my Utah Bar number is _____

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

CENTRAL DIVISION

JESSE ANNE MAJORS)
Plaintiff,)
vs.)
THOMAS JEFFERSON SCHOOL OF)
LAW, et al.,)
Defendants.)
)
MOTION FOR ORDER
GRANTING IMMEDIATE
MANDATORY INJUNCTION
FOR RELEASE OF
EDUCATIONAL TRANSCRIPT
RECORD
Case No. 2:11cv00558 CW

**MOTION FOR ORDER
GRANTING IMMEDIATE
MANDATORY INJUNCTION
FOR RELEASE OF
EDUCATIONAL TRANSCRIPT
RECORD**

Case No. 2:11cy00558 CW

Judge Clark Waddoups
Magistrate Judge Samuel Alba

BACKGROUND

8 Plaintiff requests an immediate Order Granting Plaintiff Mandatory Injunction, under
9 Rule 65 Fed.R. Civ. P., requiring Defendants to release Plaintiff's educational transcript record.
10 As indicated in Plaintiff's "Amended Pleading" and "Memorandum Supporting

11 Objection to Defendant's Motion To Dismiss", Defendant Law School, Defendant Lisa Ferreira,
12 Defendant Eric Mitnick, Defendant Jeffrey Joseph, Defendant Dean Rudy Hasl, Claudia
13 Ferguson and Kim Grennan, have all received valid requests from Plaintiff to have Plaintiff's
14 transcripts sent to various persons, including herself and the State Bar of California.

15 All above-named persons have refused, in one way or another, to release any transcripts
16 of her educational record. Please refer to and incorporate section of Plaintiff's "Memorandum
17 Supporting Objection to Defendants Motion to Dismiss" dedicated to demonstrating how the
18 Defendants have blatantly violated Plaintiff's constitutional right to her educational records
19 under FERPA¹ and evidencing how Defendants have further violated her constitutional rights
20 under the Fourteenth Amendment² to "pursuit of livelihood" by not releasing said records.

21 Because Plaintiff still has not received requested transcripts and Plaintiff has applied to
22 take a Paralegal Certification Examination, in which her law school transcript is required for
23 acceptance into the exam, Plaintiff requests a mandatory injunction requiring Defendants to
24 release those transcripts to:

25 1. The State Bar of California

26 Office of Admissions

27 1149 South Hill Street

28 Los Angeles, CA 90015

29 2. Plaintiff

30 6649 South 5500 West

31 West Jordan, UT 84081

¹ Family Educational Rights and Privacy Act of 1974 (FERPA), 20 U.S.C.A. §1232.

² U.S.C.A. Const. Amend. XIV.

33 3. NFPA

34 P.O. Box 2016

35 Edmonds, WA 98020

36 4. NALA

37 1516 South Boston, Suite 200

38 Tulsa, Oklahoma 74119

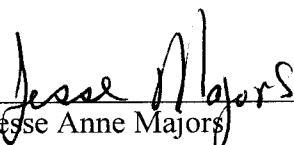
39

40 Plaintiff also requests an injunction prohibiting Defendants from taking part in any

41 communications, whatsoever, regarding Plaintiff to above referenced persons.

42

43 Dated this 19th day of July, 2011.



44
45
46
47
Jesse Anne Majors
Pro Se

Delivery Certificate

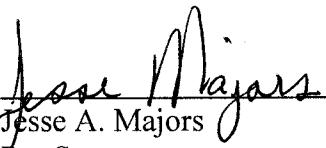
I hereby certify that I caused a true and correct copy of the foregoing Motion to be served by the method(s) indicated below and addressed to the following on this 19th day of July, 2011.

ROBERT H. WILDE #3466
BRUCE M. FRANSON #10792
ROBERT H. WILDE, ATTORNEY AT LAW, P.C.
935 East South Union Avenue Suite D-102
Midvale, Utah 84047
Telephone: (801) 255-4774
Fax: (801) 566-5202
bob@rhwildelaw.com
Attorneys for Defendant Thomas Jefferson School of Law

Delivered:

(U.S. Mail, Postage Prepaid
(Hand Delivered
(Overnight Mail
(Facsimile
(E-mail
(CM/ECF Posting

DATED this 19th day of July, 2011.



Jesse A. Majors
Pro Se